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VIA ECF

The Honorable Judge Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Velasquez v. American Giant, Inc.*, Civil Action No. 1:22-cv-3247-LJL

Dear Judge Liman:

We represent the Defendant American Giant, Inc. in the above-referenced matter. We write jointly with Plaintiff's counsel and counsel for Defendant Grand Liberte Cooperative, Inc., and are pleased to inform the Court that the parties have reached a global settlement, in principle, in connection with this matter, including the crossclaims filed against American Giant. *See* ECF. No. 21. The parties are in the process of negotiating the terms of a settlement agreement and request a sixty (60) day period of time to file a Stipulation of Dismissal.

In view of the parties' settlement, we respectfully request that the Court adjourn all pending dates and deadlines, including, without limitation, the deadline for Defendants to answer, move or otherwise respond to the complaint and crossclaims.

We thank the Court for its consideration of this matter and will certainly make ourselves available should the Court have any questions regarding this request.

Respectfully submitted,

DLA PIPER LLP (US)

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